

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
180 Montgomery Street, Suite 1200
San Francisco, California 94104

DALE L. ALLEN, JR., State Bar No. 145279
dallen@aghwlaw.com
NICHOLAS D. SYREN, State Bar No. 334807
nsyren@aghwlaw.com
ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
180 Montgomery Street, Suite 1200
San Francisco, CA 94104
Telephone: (415) 697-2000
Facsimile: (415) 813-2045

Attorneys for Defendants
HAYWARD AREA RECREATION AND PARK
DISTRICT and KEVIN HART

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ
BOLBOL, individually,

Plaintiff,

v.

ROWELL RANCH RODEO, INC.,
HAYWARD AREA RECREATION AND
PARK DISTRICT, HAYWARD AREA
RECREATION AND PARK DISTRICT
PUBLIC SAFETY MANAGER/RANGER
KEVIN HART, and DOES 1 and 2, in
their individually and official capacities,
jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

**STIPULATION AND [PROPOSED] ORDER
REGARDING MOTION FOR SUMMARY
JUDGMENT BRIEFING SCHEDULE**

To the Honorable Judge Chhabria:

The parties have met and conferred regarding a briefing schedule for their respective Motions for Summary Judgment. Plaintiffs DENIZ BOLBOL and JOSEPH P. CUVIELLO (“Plaintiffs”) filed their Joint Motion for Partial Summary Judgment (Docket 84) on June 3, 2024. Defendants (1) ROWELL RANCH RODEO, INC., (2) HAYWARD AREA RECREATION AND PARK DISTRICT/HAYWARD AREA RECREATION AND PARK DISTRICT PUBLIC SAFETY MANAGER/RANGER KEVIN HART, and (3) ALAMEDA COUNTY and ALAMEDA COUNTY DEPUTY SHERIFF JOSHUA MAYFIELD (“Defendants”) each plan to

file their respective Motions for Summary Judgment. Based on the anticipated cross motions for summary judgment, the parties agreed to the following briefing schedule in order to maintain compliance with Judge Chhabria' Standing Order, Paragraph 41.

1. **June 3, 2024** - Plaintiffs' filed Joint Motion for Partial Summary Judgment – (Dkt. 84 et al).
2. **June 27, 2024** - Defendants' Oppositions and Cross Motions for Motions for Summary Judgment Due.
3. **July 25, 2024** - Plaintiffs' Reply to Def. Opposition/Plaintiffs' Opposition to Def. Motion for Summary Judgment Due.
4. **August 1, 2024** – Defendants' Reply to Plaintiffs' Oppo. to Def. Motion for Summary Judgment Due.
5. **August 15, 2024** – Hearing Date (Same date as current Motion for Summary Judgment).

IT IS SO ORDERED.

APPROVED BY:

JUDGE VINCE CHHABRIA

Respectfully submitted,

Dated: June 13, 2024

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

By: /s/ Nicholas D. Syren
DALE L. ALLEN, JR.
NICHOLAS D. SYREN
Attorneys for Defendants
HAYWARD AREA RECREATION AND
PARK DISTRICT and KEVIN HART

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Respectfully submitted,

Dated: June 13, 2024

GREENFIRE LAW, PC

By: /s/ Jessica L. Blome
JESSICA L. BLOME
LILY RIVO
Attorneys for Plaintiff
DENIZ BOLBOL

Respectfully submitted,

Dated: June 13, 2024

By: /s/ Joseph P. CuvIELLO
JOSEPH P. CUVIELLO
Plaintiff Pro Per

Respectfully submitted,

Dated: June 13, 2024

GORDON, REES, SCULLY, MANSUKHANI,
LLP

By: /s/ Osmaan Khan
PAUL DAMIEN CALEO
OSMAAN KHAN
Attorneys for Defendants
ROWELL RANCH RODEO, INC.

Respectfully submitted,

Dated: June 13, 2024

FENNEMORE WENDEL

By: /s/ Marc Brainich
WILLIAM B. ROWELL
THIELE R. DUNAWAY
MARC BRAINICH
Attorneys for Defendants
COUNTY OF ALAMEDA and ALAMEDA
COUNTY DEPUTY SHERIFF JOSHUA
MAYFIELD